

1 Won Jae Yi  
2 2565 Telegraph Avenue  
3 Berkeley, CA 94704  
4 Defendant in Pro Per  
5 Tel)510-848-4221

FILED

JUN 26 PM 12:39

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

6  
7 WELLS FARGO BANK, N.A. as  
8 TRUSTEE for the CLARA POPPIC  
9 TRUST,

Plaintiff,

10 vs.

11  
12 KENNETH G. RENZ; JACKSOON R.  
13 DENNISON; WILEY UMSTEAD;  
14 KAZUKO UMSTEAD; WON JAE YI aka  
MICHAEL YI; NAN Y. PARK; GUAN  
HUANG; YING ZHANG and SUI SONG,

15 Defendants.  
16

Case No. CV 08 2561 - EMC

DEFENDANT WON JAE YI'S

ANSWER

17 Defendant Won Jae Yi ("Yi") for himself only, answers the Complaint of Plaintiff

18 Wells Fargo Bank ("Plaintiff") as follows:  
19

20 JURISDICTION, VENUE AND INTRADISTRICT ASSIGNMENT

21 1. Answering Paragraph 1, Yi alleges that he lacks sufficient information to form a  
22 belief as to the truth of the allegations contained therein and on that basis denies each and every  
23 allegation therein contained.  
24

25 2. Answering Paragraph 2, Yi alleges that he lacks sufficient information to form a  
26 belief as to the truth of the allegations contained therein and on that basis denies each and every  
27 allegation therein contained.  
28

Defendant Yi's Answer to Plaintiff Wells Fargo Bank

- 1           3.     Answering Paragraph 3, Yi admits that this court has jurisdiction of this action  
2                 pursuant to 28 USC Section 1331. Yi admits that venue is proper in this court  
3                 pursuant to 28 USC 1391(b).

4                                 THE PARTIES

- 5           4.     Answering Paragraph 4, Yi admits the allegations therein contained.

6           5.     Answering Paragraph 5, Yi alleges that he lacks sufficient information to form a  
7                 belief as to the truth of the allegations contained therein and on that basis denies each and every  
8                 allegation therein contained.

9  
10          6.     Answering Paragraph 6, Yi alleges that he lacks sufficient information to form a  
11                 belief as to the truth of the allegations contained therein and on that basis denies each and every  
12                 allegation therein contained.

13          7.     Answering Paragraph 7, Yi alleges that he lacks sufficient information to form a  
14                 belief as to the truth of the allegations contained therein and on that basis denies each and every  
15                 allegation therein contained.

16  
17          8.     Answering Paragraph 8, Yi alleges that he lacks sufficient information to form a  
18                 belief as to the truth of the allegations contained therein and on that basis denies each and every

- 19          9.     Answering Paragraph 9, Yi admits allegation therein contained.

20          10.    Answering Paragraph 10, Yi alleges that he lacks sufficient information to form  
21                 a belief as to the truth of the allegations contained therein and on that basis denies each and  
22                 every allegation therein contained.

23  
24          11.    Answering Paragraph 11, Yi alleges that he lacks sufficient information to form  
25                 a belief as to the truth of the allegations contained therein and on that basis denies each and  
26                 every allegation therein contained.

- 27          12.    Answering Paragraph 12, Yi alleges that he lacks sufficient  
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1 information to form a belief as to the truth of the allegations contained therein and on that basis  
2 denies each and every allegation therein contained.

3 13. Answering Paragraph 13, Yi alleges that he lacks sufficient information to form a  
4 belief as to the truth of the allegations contained therein and on that basis denies each and every  
5 allegation therein contained.

6 GENERAL ALLEGATIONS

7  
8 14. Answering Paragraph 14, Yi alleges that he lacks sufficient information to form  
9 a belief as to the truth of the allegations contained therein and on that basis denies each and  
10 every allegation therein contained.

11 15. Answering Paragraph 15, Yi alleges that he lacks sufficient information to form  
12 a belief as to the truth of the allegations contained therein and on that basis denies each and  
13 every allegation therein contained.

14 16. Answering Paragraph 16, Yi admits the allegation therein contained.

15  
16 17. Answering Paragraph 17, Yi alleges that he lacks sufficient information to form  
17 a belief as to the truth of the allegations contained therein and on that basis denies each and  
18 every allegation therein contained.

19 18. Answering Paragraph 18, Yi alleges that he lacks sufficient information to form  
20 a belief as to the truth of the allegations contained therein and on that basis denies each and  
21 every allegation therein contained.

22 19. Answering Paragraph 19, Yi alleges that he lacks sufficient information to form  
23 a belief as to the truth of the allegations contained therein and on that basis denies each and  
24 every allegation therein contained.

25  
26 20.

27 Answering Paragraph 20, Yi alleges that he lacks sufficient information to form a belief  
28

1 as to the truth of the allegations contained therein and on that basis denies each and every allega  
2 tion therein contained.

3 FIRST CLAIM FOR RELIEF

4 21. Yi repleads and incorporates by reference, as if fully set forth again herein, the  
5 answers contained in Paragraph 1 through 21 of this Answer, and incorporates them herein as if  
6 separately replied.

7 22. Answering Paragraph 22, Yi alleges that he lacks sufficient information to form  
8 a belief as to the truth of the allegations contained therein and on that basis denies each and  
9 every allegation therein contained.

10 23. Answering Paragraph 23, Yi alleges that he lacks sufficient information to form  
11 a belief as to the truth of the allegations contained therein and on that basis denies each and  
12 every allegation therein contained.

13 24. Answering Paragraph 24, Yi alleges that he lacks sufficient information to form  
14 a belief as to the truth of the allegations contained therein and on that basis denies each and  
15 every allegation therein contained.

16 25. Answering Paragraph 25, Yi alleges that he lacks sufficient information to form a  
17 belief as to the truth of the allegations contained therein and on that basis denies each and every  
18 allegation therein contained.

19 26. Answering Paragraph 26, Yi alleges that he lacks sufficient information to form a  
20 belief as to the truth of the allegations contained therein and on that basis denies each and every  
21 allegation therein contained.

22 27. Answering Paragraph 27, Yi alleges that he lacks sufficient information to form a  
23 belief as to the truth of the allegations contained therein and on that basis denies each and every  
24 allegation therein contained.

1           28. Answering Paragraph 28, Yi alleges that he lacks sufficient information to form a  
2 belief as to the truth of the allegations contained therein and on that basis denies each and every  
3 allegation therein contained.

4           29. Answering Paragraph 29, Yi alleges that he lacks sufficient information to form a  
5 belief as to the truth of the allegations contained therein and on that basis denies each and every  
6 allegation therein contained.

7           30. Answering Paragraph 30, Yi alleges that he lacks sufficient information to form a  
8 belief as to the truth of the allegations contained therein and on that basis denies each and every  
9 allegation therein contained.  
10

11           31. Answering Paragraph 31, Yi alleges that he lacks sufficient information to form a  
12 belief as to the truth of the allegations contained therein and on that basis denies each and every  
13 allegation therein contained.  
14

15                                   SECOND CLAIM FOR RELIEF

16           32. Yi repleads and incorporates by reference, as if fully set forth again herein, the  
17 answers contained in Paragraph 1 through 31 of this Answer, and incorporates them herein as if  
18 separately replied.

19           33. Answering Paragraph 33, Yi alleges that he lacks sufficient information to form a  
20 belief as to the truth of the allegations contained therein and on that basis denies each and every  
21 allegation therein contained.  
22

23           34. Answering Paragraph 34, Yi alleges that he lacks sufficient information to form a be  
24 lief as to the truth of the allegations contained therein and on that basis denies each and every  
25 allegation therein contained.

26           35. Answering Paragraph 35, Yi alleges that he lacks sufficient information to form a be  
27 lief as to the truth of the allegations contained therein and on that basis denies each and every  
28



1 allegation therein contained.

2 THIRD CLAIM FOR RELIEF

3 36. Yi repleads and incorporates by reference, as if fully set forth again herein, the answ  
4 ers contained in Paragraph 1 through 35 of this Answer, and incorporates them herein as if sepa  
5 rately replied.

6 37. Answering Paragraph 37, Yi alleges that he lacks sufficient information to form  
7 a belief as to the truth of the allegations contained therein and on that basis denies each and  
8 every allegation therein contained.

9  
10 38. Answering Paragraph 38, Yi alleges that he lacks sufficient information to form a be  
11 lief as to the truth of the allegations contained therein and on that basis denies each and  
12 every allegation therein contained.

13 39. Answering Paragraph 39, Yi alleges that he lacks sufficient information to form a be  
14 lief as to the truth of the allegations contained therein and on that basis denies each and  
15 every allegation therein contained.

16  
17 40. Answering Paragraph 40, Yi alleges that he lacks sufficient information to form a be  
18 lief as to the truth of the allegations contained therein and on that basis denies each and  
19 every allegation therein contained.

20 FOURTH CLAIM FOR RELIEF

21  
22 41. Yi repleads and incorporates by reference, as if fully set forth again herein, the answ  
23 ers contained in Paragraph 1 through 35 of this Answer, and incorporates them herein as if sepa  
24 rately replied.

25 42. Answering Paragraph 42, Yi alleges that he lacks sufficient information to form a be  
26 lief as to the truth of the allegations contained therein and on that basis denies each and  
27 every allegation therein contained.

1           43. Answering Paragraph 43, Yi alleges that he lacks sufficient information to form a be  
2       lief as to the truth of the allegations contained therein and on that basis denies each and  
3       every allegation therein contained.

4           44. Answering Paragraph 44, Yi alleges that he lacks sufficient information to form a be  
5       lief as to the truth of the allegations contained therein and on that basis denies each and  
6       every allegation therein contained.

7  
8                               FIFTH CLAIM FOR RELIEF

9           45. Yi repleads and incorporates by reference, as if fully set forth again herein, the answ  
10      ers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if sepa  
11      rately replied.

12          46. Answering Paragraph 46, Yi alleges that he lacks sufficient information to form a be  
13      lief as to the truth of the allegations contained therein and on that basis denies each and  
14      every allegation therein contained.

15  
16                               SIXTH CLAIM FOR RELIEF

17          47. Yi repleads and incorporates by reference, as if fully set forth again herein, the answ  
18      ers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if sepa  
19      rately replied.

20          48. Answering Paragraph 48, Yi alleges that he lacks sufficient information to form a  
21      belief as to the truth of the allegations contained therein and on that basis denies each and  
22      every allegation therein contained.

23  
24          49. Answering Paragraph 49, Yi alleges that he lacks sufficient information to form a  
25      belief as to the truth of the allegations contained therein and on that basis denies each and  
26      every allegation therein contained.

27          50. Answering Paragraph 50, Yi alleges that he lacks sufficient information to form a  
28

1 belief as to the truth of the allegations contained therein and on that basis denies each and  
2 every allegation therein contained.

3 51. Answering Paragraph 46, Yi alleges that he lacks sufficient information to form a  
4 belief as to the truth of the allegations contained therein and on that basis denies each and  
5 every allegation therein contained.

6 SEVENTH CLAIM FOR RELIEF

7  
8 52. Yi repleads and incorporates by reference, as if fully set forth again herein, the  
9 answers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if  
10 separately replied.

11 53. Answering Paragraph 53, Yi alleges that he lacks sufficient information to form a  
12 belief as to the truth of the allegations contained therein and on that basis denies each and  
13 every allegation therein contained.

14 54. Answering Paragraph 54, Yi alleges that he lacks sufficient information to form a  
15 belief as to the truth of the allegations contained therein and on that basis denies each and  
16 every allegation therein contained.

17 55. Answering Paragraph 55, Yi alleges that he lacks sufficient information to form a  
18 belief as to the truth of the allegations contained therein and on that basis denies each and  
19 every allegation therein contained.

20 56. Answering Paragraph 56, Yi alleges that he lacks sufficient information to form a  
21 belief as to the truth of the allegations contained therein and on that basis denies each and  
22 every allegation therein contained.

23 EIGHTH CLAIM FOR RELIEF

24 57. Yi repleads and incorporates by reference, as if fully set forth again herein, the  
25 answers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if  
26  
27  
28



1 separately replied.

2 58. Answering Paragraph 58, Yi alleges that he lacks sufficient information to form a  
3 belief as to the truth of the allegations contained therein and on that basis denies each and  
4 every allegation therein contained.

5 59. Answering Paragraph 59, Yi alleges that he lacks sufficient information to form a  
6 belief as to the truth of the allegations contained therein and on that basis denies each and  
7 every allegation therein contained.

8  
9 NINTH CLAIM FOR RELIEF

10 60. Yi repleads and incorporates by reference, as if fully set forth again herein, the  
11 answers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as i  
12 f separately replied.

13 61. Answering Paragraph 61, Yi alleges that he lacks sufficient information to form a  
14 belief as to the truth of the allegations contained therein and on that basis denies each and  
15 every allegation therein contained.

16 62. Answering Paragraph 62, Yi alleges that he lacks sufficient information to form a  
17 belief as to the truth of the allegations contained therein and on that basis denies each and  
18 every allegation therein contained.

19 63. Answering Paragraph 63, Yi alleges that he lacks sufficient information to form a  
20 belief as to the truth of the allegations contained therein and on that basis denies each and  
21 every allegation therein contained.

22  
23  
24 TENTH CLAIM FOR RELIEF

25 64. Yi repleads and incorporates by reference, as if fully set forth again herein, the answ  
26 ers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if sepa  
27 rately replied.

28 Defendant Yi's Answer to Plaintiff Wells Fargo Bank

1 65. Answering Paragraph 65, Yi alleges that he lacks sufficient information to form a  
2 belief as to the truth of the allegations contained therein and on that basis denies each and  
3 every allegation therein contained.

4 66. Answering Paragraph 63, Yi alleges that he lacks sufficient information to form a  
5 belief as to the truth of the allegations contained therein and on that basis denies each and  
6 every allegation therein contained.

7  
8 ELEVENTH CLAIM FOR RELIEF

9 67. Yi repleads and incorporates by reference, as if fully set forth again herein, the answ  
10 ers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if sepa  
11 rately replied.

12 68. Answering Paragraph 68, Yi alleges that he lacks sufficient information to form a  
13 belief as to the truth of the allegations contained therein and on that basis denies each and  
14 every allegation therein contained.

15 69. Answering Paragraph 69, Yi alleges that he lacks sufficient information to form a  
16 belief as to the truth of the allegations contained therein and on that basis denies each and  
17 every allegation therein contained.

18 70. Answering Paragraph 70, Yi alleges that he lacks sufficient information to form a  
19 belief as to the truth of the allegations contained therein and on that basis denies each and  
20 every allegation therein contained.

21 71. Answering Paragraph 71, Yi alleges that he lacks sufficient information to form a  
22 belief as to the truth of the allegations contained therein and on that basis denies each and  
23 every allegation therein contained.

24 72. Answering Paragraph 72, Yi alleges that he lacks sufficient information to form a  
25 belief as to the truth of the allegations contained therein and on that basis denies each and  
26  
27  
28

every allegation therein contained.

TWELVETH CLAIM FOR RELIEF

73. Yi repleads and incorporates by reference, as if fully set forth again herein, the answers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if separately replied.

74. Answering Paragraph 74, Yi alleges that he lacks sufficient information to form a belief as to the truth of the allegations contained therein and on that basis denies each and every allegation therein contained.

75. Answering Paragraph 75, Yi alleges that he lacks sufficient information to form a belief as to the truth of the allegations contained therein and on that basis denies each and every allegation therein contained.

76. Answering Paragraph 76, Yi alleges that he lacks sufficient information to form a belief as to the truth of the allegations contained therein and on that basis denies each and every allegation therein contained.

77. Answering Paragraph 77, Yi alleges that he lacks sufficient information to form a belief as to the truth of the allegations contained therein and on that basis denies each and every allegation therein contained.

78. Answering Paragraph 78, Yi alleges that he lacks sufficient information to form a belief as to the truth of the allegations contained therein and on that basis denies each and every allegation therein contained.

THIRTEENTH CLAIM FOR RELIEF

79. Yi repleads and incorporates by reference, as if fully set forth again herein, the answers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if separately replied.

1           80. Answering Paragraph 80, Yi alleges that he lacks sufficient information to form a  
2 belief as to the truth of the allegations contained therein and on that basis denies each and  
3 every allegation therein contained.

4           81. Answering Paragraph 81, Yi alleges that he lacks sufficient information to form a  
5 belief as to the truth of the allegations contained therein and on that basis denies each and  
6 every allegation therein contained.

7           82. Answering Paragraph 80, Yi alleges that he lacks sufficient information to form a  
8 belief as to the truth of the allegations contained therein and on that basis denies each and  
9 every allegation therein contained.  
10

11                           FOURTEEN CLAIM FOR RELIEF

12           83. Yi repleads and incorporates by reference, as if fully set forth again herein, the  
13 answers contained in Paragraph 1 through 44 of this Answer, and incorporates them herein as if  
14 separately replied.

15           84. Answering Paragraph 84, Yi alleges that he lacks sufficient information to form a  
16 belief as to the truth of the allegations contained therein and on that basis denies each and  
17 every allegation therein contained.

18           85. Answering Paragraph 85, Yi alleges that he lacks sufficient information to form a  
19 belief as to the truth of the allegations contained therein and on that basis denies each and  
20 every allegation therein contained.

21           86. Answering Paragraph 86, Yi alleges that he lacks sufficient information to form a  
22 belief as to the truth of the allegations contained therein and on that basis denies each and  
23 every allegation therein contained.

24           87. Answering Paragraph 87, Yi alleges that he lacks sufficient information to form a  
25 belief as to the truth of the allegations contained therein and on that basis denies each and  
26  
27  
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every allegation therein contained.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

As and for a first, separate and affirmative defense to the Complaint, and to each and every claim for relief contained therein, Yi alleges that Plaintiff's Complaint, and each of the purported causes of action contained therein, fails to state facts sufficient to constitute a cause or causes of action against Yi.

SECOND AFFIRMATIVE DEFENSE

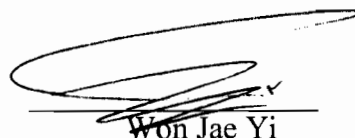
(Fault of Third Party)

As and for a second, separate and affirmative defense to the Complaint, and to each and every claim for relief contained therein, Yi alleges that if Plaintiff were found damaged it is fault of third party, not Yi.

WHEREFORE, Defendant prays for judgment as follows:

1. That Plaintiffs take nothing by reason of their complaint.
2. Costs of Suit
3. Such other relief as the Court may find just and proper.

Dated: June 24, 2008



Won Jae Yi



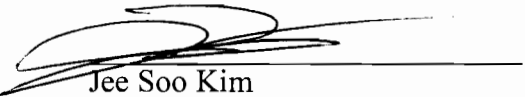
PROOF OF SERVICE BY MAIL

I, Jee Soo Kim, declare that I am a citizen of the United States and employed in the County of Alameda, State of California. I am over the age of eighteen years and not a party to the within action. My business address is 1330 Broadway, Suite, Oakland, CA 94612.

On the day set forth below I served the within ANSWER, case# CV082561 on the interested parties in this action by placing true copies thereof enclosed in a sealed envelope with first class postage thereon fully prepaid, in the United States Postal Services mail depository at Oakland, California, addressed as follows:

GREBEN & ASSOCIATES  
1332 Anacapa Street, suite 110  
Santa Barbara, CA 93101

I declare under penalty of perjury and under the laws of the State of California that the foregoing is true and correct. Executed at Oakland, California, on June 24, 2008.

  
Jee Soo Kim